

Exhibit P

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn^o
David M. Estes

Writer's Direct Dial & Email:
(973) 228-0454
aslater@mazieslater.com

Karen G. Kelsen^o
Cheryll A. Calderon
Adam M. Epstein^o
Cory J. Rothbort*^o
Michael R. Griffith^o
Christopher J. Geddis
Alexander Q. Reynoso
Samuel G. Wildman
Julia S. Slater^o

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

^oMember of N.J. & N.Y. Bars

November 18, 2020

VIA EMAIL

Jessica Priselac, Esq.
Duane Morris
505 9th Street, N.W., Suite 1000
Washington, DC 20004-2166

**Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation,
No. 1:19-md-02875**

Counsel:

Pursuant to paragraph 20 of the Confidentiality and Protective Order entered in this matter,
plaintiffs hereby object to the following confidentiality designations:

1. ZHP00406066 - ZHP00406069 – Email communication between ZHP employees regarding the response to the FDA's Warning Letter
2. PRINSTON00073431 - PRINSTON00073442 – Communication between the FDA and ZHP attaching the Form FDA 483, Inspectional Observations.
3. PRINSTON00156783 - PRINSTON00156805 – Research and Development Report of Valsartan
4. PRINSTON00147188 - PRINSTON00147188 – FDA Warning Letter
5. PRINSTON00077339 – PRINSTON00077344 – FDA Warning Letter

6. PRINSTON0000142398 – PRINSTON00142403 – Printout of Warning Letter from FDA Website
7. PRINSTON00159844 – PRINSTON00159898 – Complaint and Jury Demand

As shown by their respective descriptions, the above documents do not contain any proprietary, trade secret, or highly sensitive commercial information and certainly do not meet the standard for “CONFIDENTIAL INFORMATION” as defined in paragraph 9(B) of the Confidentiality and Protective Order. In addition, these documents relate to matters of public health and safety, and are either already available in the public sphere or presumptively to be public and non-confidential. As such, plaintiffs request ZHP de-designate these documents or promptly meet and confer regarding any refusal to do so.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read 'Adam M. Slater', written over a horizontal line.

ADAM M. SLATER

cc: Joseph S. Ferretti, Esq
Seth A. Goldberg, Esq.